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Attorneys for Plaintiffs,
Jennifer Rodriguez; and, John Tauro

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

**JENNIFER RODRIGUEZ; AND,
JOHN TAURO,
INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS
SIMILARLY SITUATED,**

Plaintiffs,

v.

ALLIED INTERSTATE, LLC,

Defendant.

Case No.: 13-cv-0388 DMS JMA

CLASS ACTION

**DECLARATION OF ABBAS
KAZEROUNIAN IN SUPPORT OF
PLAINTIFF'S EX PARTE MOTION
TO FILE DOCUMENTS
CONCERNING MOTION FOR
CLASS CERTIFICATION UNDER
SEAL**

HON. DANA M. SABRAW

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**DECLARATION OF ABBAS KAZEROUNIAN IN SUPPORT OF PLAINTIFF'S EX PARTE MOTION TO
FILE DOCUMENTS CONCERNING MOTION FOR CLASS CERTIFICATION UNDER
SEAL**

DECLARATION OF ABBAS KAZEROUNIAN

I, ABBAS KAZEROUNIAN declare:

1. I am an attorney admitted to the State Bar of California in 2007 and have been a member in good standing since that time. I have litigated cases in both state and federal courts in California, Ohio, Nevada, Tennessee, Washington and Texas. I am also admitted in every Federal district in California and have handled federal litigation in the federal districts of California. I am a partner with the law firm Kazerouni Law Group, APC, and co-counsel for Plaintiff Jennifer Rodriguez ("Plaintiff") in the above-captioned action against defendant Allied Interstate, LLC ("Defendant").
2. I have personal knowledge of the following facts and, if called upon as a witness, could and would competently testify thereto, except as to those matters which are explicitly set forth as based upon my information and belief and, as to such matters, I am informed and believe that they are true and correct.
3. I am writing this declaration in support of Plaintiff's Ex Parte Motion To File Documents Concerning Motion for Class Certification Under Seal.
4. The parties have sought and obtained a Protective Order in this case from the Honorable Jan M. Adler. *See* ECF Nos. 23 and 24.
5. The parties have designated the Deposition of Vineet Mathur; and, the Deposition of Heather Hornbuckle as "Confidential," as indicated on the cover page each of these deposition transcripts. In Plaintiffs' present Ex Parte Motion, these deposition transcripts are designated as Exhibits 1; and, 2, respectively.
6. I believe that the information contained in these depositions should be redacted in compliance with the Parties' Joint Motion for Protective Order because Mr. Mathur and Mrs. Hornbuckle both testified as to Defendant's

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1 business practices and the proprietary function of Defendant's predictive
2 dialer.

- 3 7. On December 13, 2013, I caused to be entrusted to FedEx Ground a copy of
4 the proposed sealed documents to be delivered to the attorneys for
5 Defendant in this case.
6 8. Also on December 13, 2013, I provided instructions to a courier in San
7 Diego, California to deliver a copy of the proposed sealed documents to the
8 Court by noon on December 16, 2013.
9 9. Thus, I believe there is good cause for the Court to permit Plaintiffs to file
10 redacted versions of the above-mentioned documents in support of
11 Plaintiffs' Motion for Class Certification.

12
13 I declare under penalty of perjury under the laws of California and the
14 United States that the foregoing is true and correct, and that this declaration was
15 executed on December 13, 2013.

16
17 Respectfully submitted,

18 **KAZEROUNI LAW GROUP, APC**

19
20 Date: December 13, 2013

21 By: /s/ Abbas Kazerounian
22 ABBAS KAZEROUNIAN, ESQ.
23 ATTORNEY FOR PLAINTIFF

24 **[ADDITIONAL PLAINTIFFS' COUNSEL]**

25 **HYDE & SWIGART**

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